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8 Attorneys for Bent Corydon

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF LOS ANGELES

11 CHURCH OF SCIENTOLOGY OF	)	CASE NO. C 420 153
12 CALIFORNIA,	)	
	)	DECLARATION OF TOBY L. PLEVIN
13 Plaintiff,	)	IN SUPPORT OF MOTION OF BENT
	)	CORYDON TO UNSEAL FILE
14 v.	)	
	)	
15 GERALD ARMSTRONG,	)	
	)	
16 Defendant.	)	
	)	
17 MARY SUE HUBBARD,	)	DATE: November 9, 1988
	)	TIME: 9:00 a.m.
18 Intervenor.	)	DEPT: 56
	)	

19  
20 I, Toby L. Plevin, do hereby declare as follows:

21  
22 I am over the age of eighteen and if called to the stand and  
23 sworn under oath I could competently testify as follows:

24  
25 1. I am the attorney for Bent Corydon in Los Angeles  
26 County Superior Court Case No. C 694 401, captioned Bent  
27 Corydon v. Church of Scientology et al. and in Riverside County  
28 Superior Court Case No. C 154 129, captioned Church of

EXHIBIT A  
-3-

1 Scientology Mission of Riverside et al. v. Church of Sciologos,  
2 Bent Corydon et al., which are referred to in the second  
3 paragraph of the declaration of Paul Morantz previously submitted  
4 herein. In the latter case, Sayre, Moreno, Purcell & Boucher  
5 also represents MARY CORYDON, MARK LUTOVSKI, PHIL BLACK, MARC  
6 CHACON and CHURCH OF SCIOLOGIOS.

7  
8 2. Judge Paul Breckenridge's decision in the within case  
9 made a finding confirming the existence of the so-called fair  
10 game policy of the Church of Scientology and confirming that  
11 Scientology individuals and entities implement that policy to  
12 harass their enemies.

13  
14 3. The issue of the fair game policy of the Church of  
15 Scientology, its organizations and agents is a key issue in the  
16 above-referenced lawsuits. Consequently, a certified copy of the  
17 judgment in the Armstrong case may be necessary for collateral  
18 estoppel purposes in those actions.

19  
20 4. The documentary evidence regarding fair game is also  
21 relevant to the Corydon actions because in both cases Mr. Corydon  
22 (and, in the Riverside case, his co-parties) allege tortious  
23 conduct by Scientology organizations and agents including but not  
24 limited to assault and battery, intentional infliction of  
25 emotional distress, and fraud coverina a period commencing as  
26 early as 1974 through 1982, intentional interference with  
27 prospective economic advantage and defamation.

28 / / /

EXHIBIT A

1           5.    The evidence of fair game tactics from the transcript  
2 of proceedings is also essential to a motion for a protective  
3 order that is pending in the Riverside case in which Mr. Corydon  
4 and his co-parties seek protection of the court from further  
5 harassment and discovery. Evidence regarding the patterns of  
6 abuse of the legal system by the Church of Scientology for the  
7 purposes of harassment and for obstruction of justice is crucial  
8 to that motion.

9  
10           6.    In addition to the foregoing, evidence in the files may  
11 include material relevant to the question of whether, at its  
12 inception, Scientology was a business enterprise not a religion;  
13 that religion was superimposed upon it as a convenient device for  
14 eluding various regulations and for evading taxes. Such evidence  
15 is crucial to counter the Church's defense in the Corydon actions  
16 that its tortious conduct can not be subject to adjudication  
17 because it intrudes on religious freedom.

18  
19           7.    Evidence regarding the establishment of Scientology  
20 Missions International as a means for controlling missions and  
21 the rewriting, backdating and altering Mission Board minutes is  
22 important to the defense in the Riverside action in which the  
23 validity and/or voidability of certain Board action has been  
24 raised.

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26           8.    Attached are copies of the operative complaints and  
27 cross-complaints in the Los Angeles Superior Court Case No. C 954  
28 401 and Riverside County Case No. C 154 129.

**EXHIBIT A**

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 27<sup>th</sup> day of October, 1988 at Los Angeles, California.

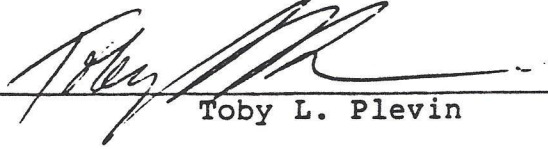
  
Toby L. Plevin

EXHIBIT A